

22 A. Yes, with the exception of the systems.

23 Q. And systems was dealt with by some other group?

24 A. Yes.

25 Q. Who was that?

0026

1 A. Greg Torretta.

2 Q. He had primary responsibility for developing the

3 systems to be used at the LISC?

4 A. Yes.

5 Q. Did you work with him at all in talking about

6 what systems would be appropriate for the LISC?

7 A. No.

8 Q. Did Leslie Wood, to your knowledge, work with

9 Mr. Torretta?

10 A. Yes.

11 Q. Were you also involved in the planning regarding

12 personnel for the LISC?

13 A. Yes.

14 Q. Were there any other issues that you had, that

15 you considered, in doing planning for the LISC, for

16 example, space requirements?

17 A. Yes, I was involved in space requirements.

18 Q. How about volume forecasts as to resale orders?

19 A. Not that much.

20 Q. How about forecasts as to LISC capacity?

21 A. I really don't recall.

22 Q. Do you know if anybody was involved in trying to

23 estimate resale order forecasts, volume forecasts?

24 A. I really -- I don't recall.

25 Q. Likewise, you don't recall anyone working on  
0027

1 LISC capacity forecasts?

2 A. It was a long time ago. No, I don't really

3 recall.

4 Q. When did the LISC first become operational?

5 A. I believe the date was December 20th of 1995.

6 Q. So is there a time line that we can sort of work

7 with as to the -- your role in Pacific Bell's creation of

8 the LISC, say from July 1, '95, through -- did you say

9 December 20th --

10 A. Yes.

11 Q. -- 1995, and so in that four, four-and-a-half

12 month period that the planning preparation was undertaken;

13 is that fair to state?

14 A. Is what fair to state?

15 Q. That in that period, in July of '95 to December

16 of '95, the preparation and the planning for the LISC was

17 undertaken?

18 A. Yes, that's correct.

19 Q. Prior, to your knowledge, prior to July of '95,

20 was there planning undertaken at Pacific Bell as to -- for

21 the LISC as to personnel processes or systems?

22 A. I don't recall.

23 Q. Do you know who had primary responsibility for

24 personnel issues, trying to determine the number and

25 quality of staff necessary for the LISC?

3 appropriate number of personnel in the LISC, wouldn't you  
4 want to know how many orders the LISC was going to have to  
5 handle?

6 MR. KOLTO-WININGER: Objection. I am going to  
7 say that that lacks foundation, but I want you to answer,  
8 and then I want to clarify something afterward.

9 THE WITNESS: Can you ask the question again?

10 MR. McDONALD: Maybe the reporter can read it  
11 back.

12 (Record read.)

13 THE WITNESS: Yes.

14 MR. KOLTO-WININGER: I want to clarify something  
15 with the witness.

16 (Discussion off the record between  
17 attorney and witness.)

18 MR. KOLTO-WININGER: Okay. My ignorance.

19 MR. McDONALD: Q. Maybe we can go back and  
20 clarify one of the distinctions we drew earlier between  
21 the facilities and the resale side -- there were two  
22 separate LISCs that we talked about, briefly.

23 A. Yes.

24 Q. I think you had mentioned that -- I think you  
25 talked about resale facilities, but is it correct to say  
0030

1 that there is a LISC for the facilities interconnection,  
2 but there is not really resale dealing with facility-based  
3 carriers, is there?

4 A. It's referred to as resale facilities and resale

5 of Plain Old Telephone Service, so both sides are referred  
6 to as resale.

7 Q. But when you talk about the resale of Plain Old  
8 Telephone Service, the Plain Old Telephone Service cost  
9 involves quite complex business customers with multiple  
10 complex, sophisticated telephone services, right?

11 A. Yes, yes.

12 Q. Let's go back. On the planning for the LISC,  
13 what was your involvement in developing the plans for  
14 determining the number of people that Pacific Bell would  
15 require to staff the LISC, and I guess it became effective  
16 December of 1995? What role did you play in that?

17 A. I would say a very minor role.

18 Q. So you were going to be the business manager in  
19 charge of its operation; is that fair to say?

20 A. Yes.

21 Q. But you weren't provided the opportunity to have  
22 input into determining the appropriate number of people to  
23 have on staff?

24 MR. KOLTO-WININGER: What time period are you  
25 talking about?

0031

1 MR. McDONALD: We are talking about July to  
2 December, before it went operational.

3 THE WITNESS: It was a long time ago, and I only  
4 vaguely remember just having a very minor role.

5 MR. McDONALD: Q. Your recollection is it was  
6 principally the finance department that made the

per \_\_\_\_\_ people to have on staff?

d Leslie Wood.

**establishing any standards**

those LISC employees?

vement in that?

ined training and --

nents.

degree that I worked with

ize the type of training that

ld, and order writers would

is a training group?

son?

as a group.

**p is professional**

sion within —

partment.

markets?

## out Pacific Bell?

11 that you were familiar with at Pacific Bell?

12 A. I am not sure I understand that question.

13 Q. Tell me why you thought it would be beneficial

14 to have people come with experience.

15 A. Because it narrows the scope of the learning

16 curve.

17 Q. Was there some minimum experience requirements

18 imposed on people hired to work at the LISC, beginning in

19 December of '95?

20 A. Yes.

21 Q. Do you know what that was?

22 A. We asked for people who had previous experience

23 either as a service rep or as an order writer.

24 Q. For the people initially hired to work at the

25 LISC, was that a requirement that you could not be hired  
0034

1 without having that experience?

2 A. No.

3 Q. It was just -- it was a preferred characteristic

4 to have?

5 A. Yes.

6 Q. Do you know what percentage of the people who

7 were initially hired to work at the LISC had some prior

8 experience?

9 A. No, I don't.

10 Q. I just want to move forward in time now. Since

11 December of 1995, additional people have been hired at the

12 LISC; is that not correct?

13 A. Yes.

14 Q. And as additional personnel have been added to  
15 the LISC, has a requirement been imposed that those new  
16 personnel have experience?

17 A. We prefer that they do have experience.

18 Q. But again, it's not a requirement?

19 A. We prefer that they have experience.

20 Q. So the answer to my question is yes, it's not a  
21 requirement; is that right?

22 A. Correct.

23 Q. Do you know what the percentage of people who  
24 have been hired at the LISC during 1996 or 1997, what  
25 percentage of those hires have had prior experience as  
0035

1 either an order writer or service representative?

2 A. No, I don't know the percentages.

3 Q. Are there records that exist that would enable  
4 us to find out what that percentage is?

5 A. No.

6 Q. Pacific Bell has no record --

7 MR. KOLTO-WININGER: That you are aware of.

8 THE WITNESS: Well, there are proprietary  
9 records that exist that are proprietary to Pacific Bell,  
10 if that answers your question.

11 MR. McDONALD: Q. And what makes these records  
12 proprietary to Pacific Bell, in your view?

13 A. Because they contain proprietary information  
14 relative to the employees.

15 Q. Is it possible for someone at Pacific Bell to  
16 review those records to identify the percentage of  
17 employees who have been employed at the LISC who have  
18 prior experience?

19 A. Yes.

20 Q. That's possible, that could be done?

21 A. Yes.

22 MR. KOLTO-WININGER: Can we take a quick two  
23 minutes?

24 MR. McDONALD: Sure.

25 (Recess taken.)

0036

1 MR. McDONALD: Q. I want to continue talking  
2 about the planning process that you were involved with for  
3 the LISC.

4 And so you were not involved in the planning  
5 relating to systems?

6 A. No.

7 Q. But you were involved, as you already, I think,  
8 testified to, in some aspect of the planning for the  
9 personnel, the training and the like, not the number of  
10 personnel, but the training?

11 A. Yes.

12 Q. And the processes, you were involved in some  
13 planning for that in your meetings with Leslie Wood and  
14 her group?

15 A. Yes.

16 Q. Is that the extent of your involvement in the



17 planning for the LISC's operation?

18 A. I also participated with customers in planning  
19 and mapping out how we were to exchange orders back and  
20 forth.

21 Q. And that occurred in the July '95 to December  
22 '95 time frame?

23 A. Yes, it began during that time frame.

24 Q. Was there a designated group of individuals  
25 within Pacific Bell who were responsible for the planning  
0037  
1 process for the LISC, besides you and Leslie Wood, and I

2 think it was Robert Hough?

3 A. Yeah. It would have been Robert Hough from the  
4 finance group and some of the people on his staff, and  
5 Leslie Wood from business process and some of the people  
6 on her staff.

7 Q. Was Jerry Sinn involved?

8 A. I really don't recall.

9 Q. On the planning for the systems, that was Greg  
10 Torretta, to your knowledge?

11 A. Yes.

12 Q. Anybody else involved?

13 A. His staff.

14 Q. But if you looked at the entire process of  
15 planning for the LISC's operation, have you now identified  
16 to us those individuals, that you were aware of, who were  
17 involved in that planning process?

18 A. Yes.

19 Q. Was there a single individual who had ultimate  
20 responsibility for the planning process for the LISC?

21 A. No.

22 Q. When you were hired, who did you think was going  
23 to be ultimately responsible for the LISC's operations?

24 A. That I would be.

25 Q. In the process of planning, you didn't think it  
0038

1 was necessary for you to get involved in ensuring that the  
2 systems that would be developed would be sufficient so  
3 that the LISC would operate well?

4 A. Wait. Go back to the last question.

5 MR. McDONALD: Can you read that back, please.

6 (Record read.)

7 THE WITNESS: Who was going to be responsible  
8 for the LISC operations? That I was the business manager  
9 responsible for the day-to-day activities of the LISC.

10 MR. McDONALD: Q. And in that capacity, did you  
11 think it was important for you to be involved in the  
12 planning for the systems, for example, to ensure that the  
13 systems that would be available to the LISC would be  
14 sufficient to handle the work that would have to be  
15 processed through the LISC?

16 A. No.

17 Q. Did you think it was necessary for you to be  
18 involved in the determination of the number of personnel  
19 who would be staffing the LISC, to ensure --

20 A. No.

21 MR. KOLTO-WININGER: You need to let him finish  
22 his question.

23 THE WITNESS: Sorry.

24 MR. McDONALD: Q. -- to ensure that the LISC  
25 operation would function appropriately?

0039

1 A. No.

2 Q. But you were involved in the planning as to the  
3 training that would be given, and you were involved in the  
4 processes planning?

5 A. Yes.

6 Q. And you had no involvement in the trying to  
7 forecast the resale orders that might be received by the  
8 LISC?

9 A. I really don't recall.

10 Q. Were you involved in any effort to try to  
11 project the LISC's capacity to handle orders?

12 A. Can you ask the question again?

13 Q. Sure. In the planning stage of this exercise,  
14 you were trying to develop certain processes LISC  
15 employees would have to use in order to process a resale  
16 order, right?

17 A. Yes.

18 Q. Did you ever try to identify the length of time,  
19 for example, that it would take to perform those various  
20 functions to process a resale order?

21 A. I played a very minor role in that, what I  
22 recall.

23 Q. Was there an effort made to try to determine,  
24 for example, how many orders could be processed in a day,  
25 when the LISC became operational?

0040

1 A. Yes.

2 Q. Who did that?

3 A. Leslie Wood and Robert Hough.

4 Q. Did they, to your knowledge, create documents  
5 reflecting those projections?

6 A. I don't recall any documents.

7 Q. How is it that you are aware that such  
8 projections were made?

9 A. I vaguely remember a conversation that took  
10 place, but again that was a long time ago.

11 Q. Do you know what they used, to try to make such  
12 projections about the LISC's capacity?

13 A. I vaguely remember that they assigned a time as  
14 to how long it would take to process an order.

15 Q. Did they do anything beyond that?

16 MR. KOLTO-WININGER: That you are aware of.

17 THE WITNESS: Not that I am aware of. I don't  
18 recall.

19 MR. McDONALD: Q. And maybe to save Ed from  
20 further instruction, I am only asking about things that  
21 you are aware of. I am not asking you to speculate or  
22 guess. So if you don't know, it's perfectly within your  
23 right to say you don't know.

24 A. Okay.

25 MR. KOLTO-WININGER: I am just trying to save  
0041  
1 her from speaking for the company when her answer may come  
2 out as though that's the case.

3 MR. McDONALD: Q. When you were involved in the  
4 planning for the personnel at the LISC, did you discuss  
5 with anyone the idea of staffing, based on universal  
6 staffing? Does that mean anything to you?

7 A. Yes, it does.

8 Q. What does it mean to you?

9 A. Universal staffing means that the service  
10 representative can handle an order as well as a billing  
11 question.

12 Q. Are there alternative ways, other than universal  
13 staffing?

14 A. Yes.

15 Q. What are the other ways?

16 A. To divide the responsibility of the service  
17 representative into only an order rep or only a billing  
18 rep.

19 Q. In the planning process for the LISC, did you  
20 discuss the benefits or detriments of having one type of  
21 staffing versus another in the LISC?

22 A. Yes, I did.

23 Q. What did you say and who did you say it to?

24 A. I don't remember who I said this to, but I

25 remember making a comment that it's important that we have  
0042  
1 service representatives who are universal trained, that

4 Q. You don't think that someone whose job function  
5 requires that they do two tasks is more likely to make  
6 mistakes in each of those tasks than an individual whose  
7 function is only to do one of those tasks?

8 A. Can you repeat that?

9 MR. McDONALD: Can you read the question back,  
10 please.

11 (Record read.)

12 MR. KOLTO-WININGER: I guess I will object that  
13 it's an incomplete hypothetical, but I want you to answer  
14 it. I can think of a lot of examples where that might not  
15 be the case, but in this context, go ahead.

16 THE WITNESS: We are talking about mistakes? I  
17 guess mistakes -- the same amount of mistakes could be  
18 made, whether the employee is a universal service rep as  
19 opposed to a regular service rep. It's -- the same amount  
20 of mistakes, I guess, could be made, whether an employee  
21 is an order rep or a universal rep.

22 MR. McDONALD: Q. So it's been your experience  
23 that universal staffing doesn't lead to an increased  
24 frequency of errors in performing the various functions  
25 that the employee has as a universal staff?

0044

1 A. In my experience? That would be a very  
2 difficult question to answer.

3 Q. You don't know?

4 A. No.

5 Q. Do you know if universal staffing has been

6 identified as one of the causes of problems at the LISC?

7 MR. KOLTO-WININGER: Other than what your  
8 attorney has told you, right?

9 MR. McDONALD: If she knows.

10 MR. KOLTO-WININGER: Don't disclose anything  
11 that your attorney has told you.

12 MR. McDONALD: Q. For the record, maybe I need  
13 to make something clear, and based on one of your answers.  
14 I am asking you some questions you have to answer. If you  
15 are going to assert that there is a privilege, you can  
16 make that statement. You are not supposed to say no when  
17 the answer is yes, simply because you think it's not  
18 something that you are supposed to reveal, okay?

19 And likewise, if you think there's something  
20 that's proprietary at Pacific Bell that you shouldn't  
21 reveal, it's not your job to make the factual -- make a  
22 statement that's misleading on the record as to that  
23 information. If you think there's something proprietary,  
24 we have an agreement now among the parties as to how we're  
25 going to deal with that information. So your job here is  
0045  
1 to respond to the questions truthfully.

2 Now, given the question I just asked, do you  
3 have a response?

4 MR. KOLTO-WININGER: And I will object. To the  
5 extent she only has knowledge based on attorney/client  
6 privileged information, I am instructing her not to answer  
7 it. If she has independent knowledge, I will allow the

8 witness to answer it.

9 THE WITNESS: I don't have independent  
10 knowledge.

11 MR. McDONALD: Q. So as far as you are  
12 concerned, universal staffing has had no impact on the  
13 LISC's operation adversely or beneficially?

14 A. We are not staffed in a universal environment.

15 Q. Currently?

16 A. Currently.

17 Q. How about previously?

18 A. No, we were not.

19 Q. You were never universally staffed?

20 A. No.

21 Q. Do you have Exhibit 3?

22 Have you ever seen this letter before? It's a  
23 one-page letter, previously marked Exhibit 3, dated  
24 October 22, from Caryn Moir, to Mr. Robert Ulrich,  
25 U-l-r-i-c-h.

0046

1 A. I don't recall seeing this.

2 Q. Do you want to take a moment to read the letter?

3 I will direct your attention particularly to the first

4 paragraph, the last two sentences prior to the bullet

5 points.

6 A. You wanted me to focus on the first two bullets?

7 Q. No. The two sentences that precede the bullets.

8 A. Where it starts with, "I am extremely" --

9 Q. Yeah, that's fine. You can read that one or the



10 next one, "Some of the problems" — just read it to  
11 yourself. I just want to make sure you have a chance to  
12 look at it.

13 A. Okay.

14 Q. Do you know who Caryn Moir is?

15 A. Yes, I do.

16 Q. She is a director in Pacific Bell's industry  
17 markets group; is that right?

18 A. Yes.

19 Q. And her responsibility is in the AT&T account  
20 team?

21 A. Yes.

22 Q. This letter contains a statement signed by  
23 Ms. Moir that addresses problems in the LISC; is that not  
24 correct?

25 A. Yes, it is correct.

0047

1 Q. And the sentence in the first paragraph, one  
2 sentence reads, "Some of the problems that we have  
3 identified are universal staffing in the LISC"; is that  
4 not correct?

5 A. That's correct.

6 Q. Now, is it your testimony that there was no  
7 universal staffing at the LISC?

8 MR. KOLTO-WININGER: I am going to object,  
9 because that is her testimony, so she stated it. But I am  
10 going to object because your question is misleading in  
11 that Caryn Moir gave a different explanation for universal

12 staffing, as is reflected in the first bullet point. And  
13 therefore, your question is misleading the witness because  
14 they don't have the same understanding.

15 MR. McDONALD: Well, she is entitled to give the  
16 testimony. I wasn't intending to --

17 MR. KOLTO-WININGER: She doesn't know the  
18 contents of the letter, so it's not a fair question.

19 MR. McDONALD: I haven't noticed your  
20 deposition, and if you want to testify, I will.

21 MR. KOLTO-WININGER: I am objecting that your  
22 question is misleading as asked.

23 MR. McDONALD: You can make that objection.

24 MR. KOLTO-WININGER: I am and I just did.

25 MR. McDONALD: I am entitled to a response. I  
0048

1 don't want to get your testimony.

2 THE WITNESS: What is your question?

3 MR. McDONALD: Can you read the question back.

4 (Record read.)

5 MR. KOLTO-WININGER: Objection. Asked and  
6 answered; and calls for speculation, unless you know what  
7 Caryn Moir meant by that. Go ahead and answer it.

8 THE WITNESS: I don't have a clue as to what she  
9 means by that.

10 MR. McDONALD: Q. So the term -- your use of  
11 the term, "universal staffing," you believe may be  
12 different from Caryn Moir's use of the term, "universal  
13 staffing?"

16 mean, you earlier testified that you can call that a  
17 resale operation, but is that really resale, to your  
18 understanding?

19 A. It's classified as resale.

20 Q. And it deals with the facilities based carrier?

21 A. Yes.

22 Q. Now, the planning that you had done between July  
23 and December of 1995, was that done in anticipation of

24 both the resale of the Plain Old Telephone Service that we  
25 talked about, as well as the facilities based?

0050

1 A. Yes.

2 Q. In that planning, had there been a distinction

3 drawn between what would be the resources that would be

4 necessary to perform the resale function for Plain Old

5 Telephone Service versus the facilities based?

6 A. Yes.

7 Q. What distinctions had been drawn?

8 A. That the group -- that there were two separate

9 groups, facility based versus resale for POTS.

10 Q. Were there going to be separate staffing for

11 each side of that?

12 A. Yes.

13 Q. And the staffing that went into effect in

14 December 1995, was that solely for the facilities based

15 business?

16 A. Yes.

17 Q. And your responsibilities, at that time, covered

18 both facilities based and the POTS, as you call it,

19 P-O-T-S?

20 A. Yes.

21 Q. At some point, did your responsibilities become

22 more narrowed?

23 A. Yes.

24 Q. When did that occur?

25 A. In July, 1996.

0051

1 Q. What happened then?

2 A. An additional business manager was added to the

3 group, Gracie Gutierrez, and we divided our

4 responsibilities.

5 Q. Did she take responsibilities for the facilities

6 part of the business?

7 A. No.

8 Q. So to this day, have you retained responsibility

9 for the facilities business?

10 A. No.

11 Q. When did you lose that responsibility?

12 A. September of '96.

13 Q. What did Ms. Gutierrez come in to do in July of

14 '96? You said there was a division of responsibility in

15 July of '96. What was it?

16 A. She came in to assist with processes in the

17 LISC.

18 Q. Why was she added?

19 A. Because I was traveling a lot because of

20 customer commitments, and I needed assistance in the LISC.

21 I needed someone to help me manage.

22 Q. Ms. Gutierrez, did she come in as a subordinate

23 or on the same line level as you?

24 A. Same line level.

25 Q. You were traveling for meetings with customers,  
0052

1 did you say?

2 A. Yes.

3 Q. Those were customers of the facilities side of

4 the business or the POTS side of the business?

5 A. POTS.

6 Q. When did that traveling take place?

7 A. It began in January.

8 Q. '96?

9 A. '96 through current.

10 Q. When did Pacific start processing resale orders

11 for the POTS service?

12 A. In the end of May of 1996.

13 Q. So from the time period between December 1995

14 and May of 1996, the only LISC operation was exclusively

15 the facilities based business?

16 A. Processing of orders, yes.

17 Q. And when the planning for the LISC took place,

18 were there different processes that were established for

19 the facilities business, versus the POTS business?

20 A. Yes.

21 Q. When you hired LISC employees, was there

22 different training that was given to LISC employees who  
23 would handle the facilities business, versus those who  
24 would handle the POTS business?

25 A. Yes.

0053

1 Q. So all the employees who came on board in  
2 December of 1995, or who started working at the LISC in  
3 December of 1995, were they trained only in the facilities  
4 resale business?

5 A. Yes.

6 Q. Until December 1995, had anyone been trained in  
7 the resale of the POTS business?

8 A. No.

9 Q. When did that training commence?

10 A. I am not sure of the exact day. I think it was  
11 like January 6th of 1996.

12 Q. Do you know how many employees were trained at  
13 that time?

14 A. I don't recall the exact amount.

15 Q. When were there employees at the LISC available  
16 to work, who had been trained in resale of POTS?

17 A. The first group of employees arrived  
18 mid-February.

19 Q. Was the training, then, a month-long program?

20 A. Anywhere from a month to six weeks.

21 Q. And does that vary, based upon the amount of  
22 experience the employees had?

23 A. Yes, it does.

24 Q. So presumably, if someone was previously an

25 order writer or a service rep, they would require less

0054

1 training?

2 A. Yes.

3 Q. Do you know how many individuals this was, in

4 that first group that was available at the LISC, to handle

5 the resale of POTS during 1996?

6 A. I don't recall the exact amount.

7 Q. Was it more than the number of people in the

8 facilities side?

9 A. Yes.

10 Q. Was it more than 50, to your knowledge?

11 A. No.

12 Q. Between 20 and 50? I am trying to get a

13 ballpark.

14 A. I would say between 20 and 50.

15 Q. Has the number of LISC employees, who perform

16 work not for the facilities business, has that changed

17 over time?

18 A. Yes.

19 Q. So we started somewhere between 20 and 50

20 employees?

21 A. Uhm-hum.

22 Q. Are there milestones over time that, within six

23 months, the number had doubled? Do you have any

24 recollection of what the number of employees, handling the

25 nonfacilities business in the LISC, was over the period

0055

1 of, starting February of '96 to the current day?

2 A. Just for the facilities side?

3 Q. The non.

4 A. Nonfacilities side?

5 Q. What you have called the POTS side.

6 A. POTS. I want to make sure I answer the question  
7 appropriately.

8 MR. KOLTO-WININGER: Do you have a general  
9 understanding of how it increased over time?

10 THE WITNESS: Yes, I do.

11 MR. McDONALD: Q. So in February, the LISC had  
12 20 to 50 people who were capable of handling the POTS  
13 resale business; is that right?

14 A. Yes.

15 Q. Did that number grow over the next three months?

16 A. Yes.

17 Q. Do you know by May what that number had grown  
18 to?

19 A. I don't recall the exact number. I believe it  
20 was right around 75 to 85.

21 Q. And that would be at about the time when the  
22 first orders came in for resale?

23 A. Correct.

24 Q. And of that 75 to 85, do you know how many  
25 people previously had served as service representatives or  
0056

1 order writers?

2 A. I don't remember the exact amount, but there



5 side, at about a hundred or a little over a hundred?

6 A. Yes.

7 Q. Since December of '96, have the number of LISC  
8 employees grown, those serving the resale business?

9 A. Since December?

10 Q. Yes.

11 A. Yes.

12 Q. Can you describe how it has grown?

13 A. Are you looking for numbers?

14 Q. If you have that information, yeah.

15 A. I don't, readily available.

16 Q. But in January, was another group added?

17 A. Yes, I think there was.

18 Q. Do you know how many were added then?

19 A. No, I don't.

20 Q. How about February?

21 A. I don't believe any in February.

22 Q. And in March, have there been any added during  
23 the month of March?

24 A. Yes.

25 Q. Do you know how many?  
0058

1 A. Wait. Let me back up. During February and  
2 March, probably about 80.

3 Q. February to March time frame, another 80 or so?

4 A. Yeah.

5 Q. So currently, do you know what the approximate  
6 number of employees at the LISC, handling the resale of